ENFORCEMENT CONFIDENTIAL – Not Releasable Under Freedom of Information Act
Spill Prevention Control and Countermeasures Inspection
COMPLIANCE INSPECTION REPORT

Aloha Petroleum Ltd./Equilon Enterprises

Hilo Sales Terminal

Inspection Date: November 8, 2004

SPCC Case No.: 05-4022

Administrative Information

							Draft	Final
SPCC Case #	05-4022	**Inspection Date**	11-08-04	**Report Date**	12-13-04	**Report Version**	☐	☒

	Name	Address	City	State	Zip	
Facility	Aloha Petroleum Hilo Sales Terminal (***Send letter to George Mitsuda, at the following address in Italics)*	*99 Kalanianaole*	*Hilo*	*HI*	*96720*	Check if same as above
Owner Name	Aloha Petroleum Ltd.	P.O. Box 500	Honolulu	HI	96809	☒
Operator Name						☒
Facility Startup	08/63	**Hours of Operation**	9	**hrs/day**	5	**days/wk**

Additional Information

Photographs taken during the site visit are included below. A copy of the facility's SPCC Plan is included in a as Attachment B. This inspection was attended by Mike Cripps of the Hawaii Department of Health, Hazard Evaluation, Emergency Response office. The facility is located in the industrial section of Hilo, Hawaii, approximately ¼ mile from the Kuhio Inner Harbor. The card lock portion of the facility is accessible to authorized haulers 24 hours per day, seven days per week.

Inspectors

Name	Agency/Company	Phone
Peter Reich	U.S. Environmental Protection Agency	415-972-3052
Mike Cripps	Hawaii DOH, HEER Office	808-586-4249

Primary Facility Contacts

Name	Title	Phone
George Mitsuda	Terminal Manager	808-521-3872

Facility Description

Type of Business: **SIC Code** 5171 **Description** Petroleum Bulk Stations and Terminals

Petroleum Storage: **Total Gallons** 1,750,392 **No. of ASTs** 7 **Total AST Gallons** 1,742,412

No. of USTs **Total UST Gallons** 7,980

No. of PCs Not evaluated **Total PC Gallons** Not evaluated

No. of Op. equip using oil See SPCC Plan **Total Gallons**

Facility Information: **Total Acreage** ~1 **Wholly contiguous site?** Yes ☒ No ☐

Surface Water: **Nearest Water Body Name:** Kuhio Inner Harbor, Pacific Ocean **Distance to Water Body:** ~1/4 mile

Drainage Pathway to Nearest Water Body: Drainage from the plant is controlled and nothing is discharged to a navigable water. The facility is located less than a ¼ mile from the Kuhio Inner Harbor which is an extension of the Pacific Ocean. The containment basin of the tank farm may not be sufficiently impervious to contain spilled oil for extended periods. Groundwater is present in the area and if a spill were to occur and hit groundwater, there is a likelihood that it would discharge to Kuhio Inner Harbor through subsurface migration

Photographs of Facility:

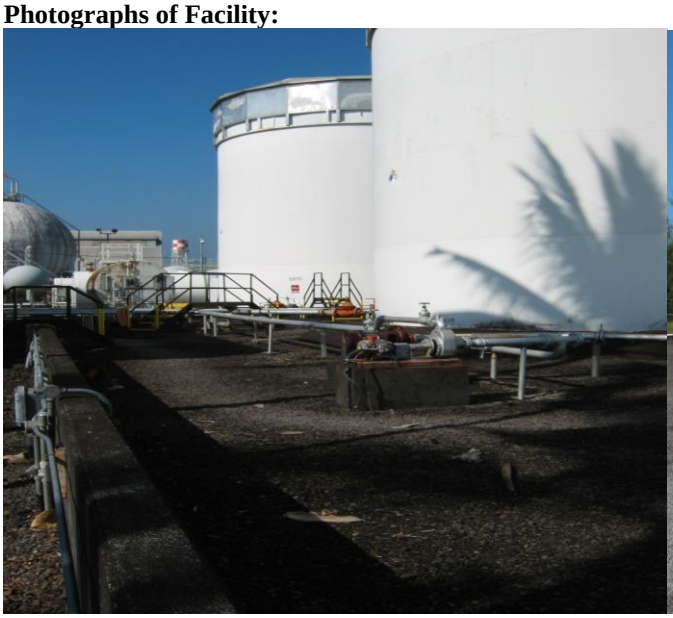

Photo 1. Aboveground tanks and containment basin.

Photo 2. OWS double wall horizontal Aboveground tanks.

Inspection Scope

This inspection was conducted in conformance with the protocol outlined in U.S. Environmental Protection Agency (EPA) Region IX Draft "SPCC Inspection Protocol" dated January 10, 2003, to ascertain the facility's compliance with the Final Rule for Title 40 *Code of Federal Regulations* (40 CFR) Part 112 published on July 17, 2002.

Findings

During the physical inspection of the facility, tankage, operational equipment using oil, drainage control systems, piping and secondary containment areas were inspected for conformance to 40 CFR Part 112 guidelines. Deficiencies were identified with the SPCC Plan. The secondary containment system may not be sufficiently impervious to contain spilled oil. The physical extent of the inspection and findings are summarized as follows:

General-Facility Attributes:

Attribute complies with guidelines?	Yes	No	Comments
SPCC Plan requirements 112.1-112.5	☐	☒	Inadequate - Deficiency # 1
General drainage controls 112.7(c)	☒	☐	Adequate
Inspections, Tests and Records 112.7(e)	☒	☐	Adequate
Personnel Training 112.7(f)	☒	☐	Adequate
Security 112.7(g)	☒	☐	Adequate
Tank car loading/unloading 112.7(h)	☒	☐	Adequate
Facility Drainage 112.8(b)	☒	☐	Adequate
Bulk Storage Containers 112.8(c)	☐	☒	Inadequate – See Deficiency # 2

Transfer Operations, Pumping, Facility process	☒	☐	Adequate
Substantial Harm Criteria Checklist 112.20	☒	☐	Adequate

Deficiency Number:	1
Type:	SPCC Plan Review
Observation:	The plan was certified by the Professional Engineer in 1997. The plan was signed for Management Approval in 1999. The plan has not been reviewed by the operator since 1999. Under the old SPCC Regulation, the plan should have been reviewed after three years, or in 2002. The plan was not reviewed as required by management at that time.
Requirement:	40 CFR § 112.5(b) requires that SPCC Plans be reviewed every five years. However, the operator did not document the last required three year plan review, which would have been in 2002.
Deficiency No. 2	Inspection, Plan Review
Observation:	The containment basin, visible in Photo No. 1, contains volcanic rock and material and does not appear to be sufficiently impervious to contain spilled oil. The SPCC Plan does not discuss the impermeability of the containment basin materials other than indicating that the secondary containment wall is capable of containing the contents of the largest tank. The SPCC Plan should be amended to provide further details of how and why the containment basin would be sufficiently impervious to contain spilled oil.
	40 CFR § 112.8(c)(2) requires that you provide a secondary means of containment for the entire capacity of the largest single container and sufficient freeboard to contain precipitation. You must ensure that diked areas are sufficiently impervious to contain discharged oil.

Acronyms

API	American Petroleum Institute	**OWS**	Oil/water separator
AOC	Area of concern	**PC**	Portable containers
AST	Aboveground storage tank	**SPCC**	Spill Prevention Control and Countermeasure
CFR	*Code of Federal Regulations*	**UST**	Underground storage tank
NAIC	North American Industrial Classification	**WWTS**	Wastewater treatment system

ATTACHMENT B

SPCC PLAN